

Montana Republican Party

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PO Box 935 (mailing add.)
Helena, MT 59624

(406) 442-6469 (ph.)
(406) 442-3293 (fax)
www.mtgop.org

FEDERAL ELECTION
COMMISSION
SECRET

Executive Director Charles Denowh
Political Director Brock Lowrance

2006 SEP 19 P 4:12

Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

SENSITIVE

September 13, 2006

MUR #

5816

Dear Sir:

This writing constitutes a formal complaint to the Federal Election Commission (the "Commission"). This complaint is based upon information and belief.

This complaint alleges violations of Federal Election Campaign Act ("FECA") and Commission regulations against Montanans for Lindeen, the principle campaign committee of Congressional candidate Monica Lindeen.

The complaint alleges the following:

1. On September 8, 2006, it came to my attention that the Montanans for Lindeen committee was soliciting contributions from corporations and businesses in a Montanans for Lindeen "House Party Kit" available on her website www.lindeen.net. On page 11 of this document titled "Host a House Party for Monica", the Lindeen campaign advises that, "Under Federal Election law, Montanans for Lindeen may accept contributions of up to \$2,100 for the primary and general elections from individuals, businesses, corporations, and small contributor committees (emphasis added)." A copy of this campaign material is attached as Exhibit 1.
2. According to FEC regulations, "A candidate, individual holding Federal office, agent of a candidate or an individual holding Federal Office...shall not solicit, receive, direct, transfer, or spend funds in connection with an election for Federal Office, including funds for Federal office, including funds for any Federal election activity, unless the funds are subject to the limitations, prohibitions, and reporting requirements of this Act." [See 2 U.S.C. § 441(i)(e)(1)]
3. Additionally, according to FEC regulations, "Campaigns may not accept contributions made from the general treasury funds of corporations, labor

Hon. Karl Ohs
Chairman

Kären Pfaehler
Co-Chairwoman

Hon. Allen Kolstad
Nat'l Committeeman

Betti Hill
Nat'l Committeewoman

Cynthia Johnson
Secretary

Shirley Warehime
Treasurer

Thelma Baker
Asst. Treasurer

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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

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4. organizations, or national banks. This prohibition applies to any incorporated organization, including a nonstock corporation, a trade association, an incorporated membership organization and an incorporated cooperative." [See: 11 CFR 114.2(a) and (b)]

Based on the above-alleged violations of the FEC regulations, I respectfully request that the Commission further investigate whether:

- (1) Montanans for Lindeen are in violation of FEC regulations pertaining to the solicitation of corporate and business contributions.

Sincerely,

Charles Denowh

CHARLES DENOWH

Executive Director, Montana Republican Party

P.O. Box 935

Helena, MT 59624

STATE OF MONTANA, COUNTY OF Levi & Clark

I, Charles Denowh, being duly sworn, state that the information in this Complaint is complete, true, and correct, to the best of my knowledge and belief.

Charles Denowh

Signature of Complainant

Subscribed and sworn to before me on this 13 day of Sept, 2004.

Deanna L Tierney

Notary Public

My commission expires: 10-30-2007

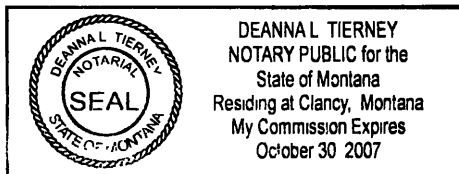


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Quick Guide Page 6 Easy Steps to Hosting a House Party**1) So you want to host a house party...let us know you are hosting a party:**

- a) Sign up online: www.lindeen.net
- b) Fill out the Host Form and fax back to our house party team:

Western Montana - Bryce
Eastern Montana - Jesse

2) Create a guest list

You can invite your own guests and we can also connect you with Lindeen supporters in your area. We recommend inviting more people than your goal because not everyone will attend. Think about inviting some of the following people— you'll be amazed by how many people you know.

3) Set a fundraising goal

While house parties are about engaging and exciting voters about Monica Lindeen, they also help raise essential money for the campaign. Most hosts set a goal of raising between \$2500 - \$5000 per party.

4) Invite your guests

Start inviting guests as soon as possible. Here are some ways to invite your guests to your party:

- i) Set up a house party page at www.lindeen.net to track your RSVP's, fundraising goal, and to send invitations and reminders to your guests.
- ii) Send an email from your personal email account
- iii) Create an invitation (see our sample invitation in Set-up Materials, Page 7)
- iv) Call your guests to make a personal connection.

5) Party Day

The most important thing to remember about House Party Day is to raise money and have fun! We've created a helpful checklist to remember all of the things you need to do:

- i) Sign-in Guests
- ii) Accept Contributions
- iii) Show the "Meet our Monica" DVD
- iv) Computer with Internet for Donations
- v) Participate in the house party theme game or contest

6) Stay in Touch

After your party, we need to collect all of your contributions, sign-in sheets, and future house-party host sign-ins. We also have a wrap up conference call to talk about how much fun you had at your party!

Getting Started

1. Invite your guests

How many people should I invite?

We encourage hosts to have at least 15 guests at their house party. It's a good idea to invite more people than your goal because not everyone will be able to attend.

Who should I invite?

Would a party be any fun without these people?

- Family
- Friends
- Coworkers
- Social Acquaintances
- Neighbors
- Members of your church, temple, mosque or other religious gathering place
- Members of your labor union

Other people to consider inviting:

- Members of the PTA, political club, community group, investment clubs/groups, and local peace, environmental, and social justice organizations
- Members of your bowling league, volleyball team, cooking group, and your poker buddies, friends from night classes, the gym, and members of your choir
- People in your address books, on the invitation list from your last party, on your holiday card list, and from your last reunion

We will also connect you with Lindeen supporters in your area if you are hosting a party that is open to the public.

How do I invite people?

• **Online:** We recommend that you create a *Montanans for Lindeen* RSVP page on our website. It's very easy and will let you track your RSVP's, donations, and send messages to your guests.

• **Email:** Send an email to your friends. Send them to your *Montanans for Lindeen* page or provide all the info in your message.

• **Flier:** Use our sample invitation to make fliers for your office, club, neighborhood or mailings. (see Sample Invite in the Materials section)

• **Phone Calls:** Follow up your emails with a friendly phone call. Your guests will appreciate the personal touch.

<ul style="list-style-type: none"> • Family • Friends • Coworkers • Social Acquaintances 	<ul style="list-style-type: none"> • Neighbors • Members of your political group, club or organization • Members of your labor unions
--	--

2. Set a Fundraising Goal

How much should I raise?

We encourage parties to raise at least \$500. Some hosts will try to raise as much as \$2500 per party.

While house parties are about engaging and exciting voters about Monica's campaign, they also raise essential money for the campaign. Your guests will be willing to help you reach your goal if you make it easy for them!

How can I reach my goal in 3 weeks?

Here are some tips on how to reach your goal.

\$500 = 10 people @ \$50 Strategy: 3-4 guests a week Get 3 family members Get 4 friends Get 3 co-workers/neighbors	\$500 = 20 people @ \$25 Strategy: 4 guests a week Get 4 family members Get 4 friends Get 2 co-workers/neighbors Ask each guest to bring one person	\$510 = 30 people @ \$17 Strategy: 5 guests a week Get 5 family members Get 5 friends Get 5 co-workers/neighbors Ask each guest to bring one person
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How do I collect money?

We will provide more details in the Party Day section, but here are some important things to consider when asking your guests to donate:

- **We cannot accept cash contributions.**
- **Online:** This is the best way to reach your goal. It's less paperwork for you and easy for your guests! Encourage guests to make a contribution online before the party. You may also consider having a computer with internet access available at your party.
- **Checks:** Guests writing checks will need to complete a Contribution Form. Hosts will be responsible for mailing these checks to your house party coordinator after the party.

(See "Party Day" for more details on how to handle contributions)

How much money should I spend on my party?

While there are no limits to the amount you can spend on an event, we encourage you to be realistic and not to overspend. A good rule of thumb is not to spend more than 10%-20% of what you plan to raise at your event.

We need to report the costs of the event, such as food and beverages, as a non-monetary contribution. Please keep any receipts for items you purchase. (See "Follow-up" for more details on In-Kind Contributions)

3. Materials

The following materials will help you plan your party.

Host Sign-Up Form

If you are NOT creating a *Montanans for Lindeen* party page online, please fill out the Host Form on page 6, and fax it back to Jennifer Slempe

Sample Invitation

If you are NOT using our online invitation, use the template on page 7 to invite guests to your party.

Guest List

Need help deciding who to invite to your house party? Use the sheet on page 8 to brainstorm who to invite. You'll be amazed by how many people you know once you start listing them out.

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HOST SIGN UP FORM

If you are not creating a Montanans for Lindeen page online, please complete this form and fax back to Jennifer Slemo as soon as possible.

I want to host a house party!

Name: _____ Location of House Party: _____ _____ _____ Is this your home address? YES / NO Daytime Phone: _____ Evening Phone: _____ Email: _____ Fax Number: _____	Is your event open to the public? YES / NO How many people do you plan to invite? 10-15 15-25 25-40 40+ Other: _____ Fundraising Goal: (Circle one) \$5000 \$2500 \$1000 Other: _____ Do you have access to a DVD player? YES / NO Do you have a home computer with internet*? YES / NO (*Optional)
--	---

By hosting a Montanans for Lindeen House Party, you agree to the following rules:

- As a Host, I acknowledge that I am volunteering my time and efforts, but am not otherwise affiliated with the campaign or an official campaign representative.
- As long as I hold the party in a private home, I understand that I can spend up to \$500.00 in party costs without filing any reports. Contact the Lindeen campaign for more information.

(Signature) _____ (Today's Date) _____

Please fax or mail this form to your Lindeen 2006 House Party team leader:

P.O. Box 30672
 Billings, MT 59107
 Phone:
 Fax:
Jennifer@lindeen.net

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SAMPLE INVITATION

Please Join
(name)

at a

Montanans for Lindeen House Party

With our next Congresswomen

Monica Lindeen

To celebrate her campaign for
Congress 2006

(date)

(time)

(location)

(address)

Requested contribution: \$30 per person

Please R.S.V.P. to (name and contact info)

Checks should be made payable to "Montanans for Lindeen"

Contributions to Montanans for Lindeen are not tax deductible for federal
income tax purposes.



GUEST LIST

Are you not quite sure you know enough people to have a house party? You may be amazed if you just start making a list.

1 _____	17 _____
2 _____	18 _____
3 _____	19 _____
4 _____	20 _____
5 _____	21 _____
6 _____	22 _____
7 _____	23 _____
8 _____	24 _____
9 _____	25 _____
10 _____	26 _____
11 _____	27 _____
12 _____	28 _____
13 _____	29 _____
14 _____	30 _____
15 _____	31 _____
16 _____	32 _____

Once you have finished your list, start inviting guests! Send them an email, call them up or send them a flier. Remember that a personal call from you is usually the best way to ensure a well-attended event.

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Party Day

1. Party Day Checklist

House Party Set Up

You should have a table or area designated for the items below. We suggest you have the sign-in table as close to the entrance of your house party as possible. It is very important to collect your guests' information!

- ☐ ☐ Guest Sign-in
 - o Volunteer to greet guests
 - o Sign-in sheets (5-10 per party)
 - o Pens
 - o Name tags
- ☐ ☐ Contributions
 - o Volunteer to collect contributions
 - o Contribution forms (enough for each guest)
 - o Pens
- ☐ ☐ Campaign Materials
 - o Buttons
 - o Bumper stickers
 - o Rally Signs
- ☐ ☐ Voter registration forms and instructions
- ☐ ☐ Food and beverages
 - o Volunteers to help set up and serve
 - o Plates, cups, utensils, trash bags, ice

Other Things to Remember

- ☐ ☐ Tables and chairs in an area for guests to gather
- ☐ ☐ TV and DVD player to play the "Meet Monica" DVD
- ☐ ☐ Speaker phone and call-in number for the conference call
- ☐ ☐ Computer with internet access: to sign up and contribute on www.lindeen.com
- ☐ ☐ Volunteers are available upon request. We will put them in touch with you.

2. Agenda and Activities

We've put together some activities for your Montanans For Lindeen House Party so you can help make Monica Lindeen the next congresswomen from Montana!

Suggested Agenda

1. Introductions
2. Tell guests why YOU are supporting Monica Lindeen
3. Share what you have done/ or are planning on doing to help the campaign
4. Watch the Lindeen 2006 DVD
5. Ask guests to make a contribution to Monica's campaign
6. Encourage guests to sign up to:
 - Volunteer (on sign-in sheet or online)
 - Host a House Party (online or form provided)
 - Endorse Monica (on sign-in sheet or online)
 - Recruit 10 friends
 - Raise money for Lindeen 2006

Suggested Activities

1. Play our house party theme game (log onto our website for ideas!)
2. Take "paparazzi" pictures of your guests (preferably digital) for our campaign website
3. Sign a petition (provided by the campaign)
4. Ask guests to write a Letter to the Editor
5. Ask guests to register to vote (provided by the campaign)

3. Guidelines for Campaign Contributions

Payment Types:

- **Online:** We recommend that guests contribute online before the party. If possible, we suggest that hosts set up a computer with internet access for guests to use at the party. Contribute online at www.lindeen.net
- **Contribution Form:** Guests can contribute by check or credit card by completely filling out the Contribution form.
- **We cannot accept cash donations of any amount.**

Required Information

Federal Election Laws require us to obtain certain information about campaign donors. Use the Contribution Form to make sure guests provide the following information:

- Name
- Address (No P.O. boxes please!)
- Phone Number
- Occupation/title
- Employer (If self-employed, name of business)

Donation Limits

Under Federal Election law, Montanans for Lindeen may accept contributions of up to \$2,100 per election for the primary and general elections from individuals, businesses, corporations, and small contributor committees. Contributions from foreign nationals are prohibited, unless an individual is lawfully admitted for permanent residence in the United States. Montanans for Lindeen is a committee formed to support Monica Lindeen's campaign for Congress.

Contributions to Montanans for Lindeen are not tax deductible for federal income tax purposes.

In-Kind Contributions (Host Expenses)

While there are no limits to the amount you can spend on an event, we encourage you to be realistic and not to overspend. A good rule of thumb is not to spend more than 10%-20% of what you plan to raise at your event.

Under federal law, an individual can spend up to \$1,000 on food, beverages and invitations while hosting a house party in their private home. This \$1000 does not count against your individual contribution limit (\$2,100 for the primary and the general election) although you should keep records of these expenses so the amount spent can be documented.

We need to report the costs of the event, such as food and beverages, as a non-monetary contribution. Please complete the In-Kind Contribution form to collect the total costs paid, a brief description of the costs, and the person or entity that paid them so that we may report this contribution in compliance with Federal Campaign law.

4. Party Day Materials

Forms provided here:

- Party Day Checklist (page 9)
- Sign in Sheet (page 13)
- Contribution Form (page 14)
- In-Kind Contribution Form (page 15)

Things you can download from www.lindeen.net:

- Party Day Checklist
- Sign in Sheets
- Contributions Forms
- Monica Lindeen's Bio: www.lindeen.net
- Issue Sheets, www.lindeen.net/issues/
- Voter Registration form

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Lindeen

**Please sign in to
receive updates
from the Lindeen
Campaign.**

**Please mail or fax
completed forms to:**
P.O. Box 30672
Billings, MT, 59107

FIRST	LAST	PHONE	EMAIL
ADDRESS	CITY	STATE	Zip
VOLUNTEER.	ENDORSE Monica Lindeen:	HOST A HOUSE PARTY:	

FIRST	LAST	PHONE	EMAIL
ADDRESS	CITY	STATE	Zip
VOLUNTEER:	ENDORSE Monica Lindeen:	HOST A HOUSE PARTY:	

FIRST	LAST	PHONE	EMAIL
ADDRESS	CITY	STATE	Zip
VOLUNTEER	ENDORSE Monica Lindeen	HOST A HOUSE PARTY:	

FIRST	LAST	PHONE	EMAIL
ADDRESS	CITY	STATE	Zip
VOLUNTEER.	ENDORSE Monica Lindeen.	HOST A HOUSE PARTY:	

FIRST	LAST	PHONE	EMAIL
ADDRESS	CITY	STATE	Zip
VOLUNTEER:	ENDORSE Monica Lindeen:	HOST A HOUSE PARTY:	

FIRST	LAST	PHONE	EMAIL
ADDRESS	CITY	STATE	Zip
VOLUNTEER:	ENDORSE Monica Lindeen:	HOST A HOUSE PARTY:	

FIRST	LAST	PHONE	EMAIL
ADDRESS	CITY	STATE	Zip
VOLUNTEER	ENDORSE Monica Lindeen	HOST A HOUSE PARTY:	

FIRST	LAST	PHONE	EMAIL
ADDRESS	CITY	STATE	Zip
VOLUNTEER	ENDORSE Monica Lindeen	HOST A HOUSE PARTY:	

FIRST	LAST	PHONE	EMAIL
ADDRESS	CITY	STATE	Zip
VOLUNTEER	ENDORSE Monica Lindeen	HOST A HOUSE PARTY:	

FIRST	LAST	PHONE	EMAIL
ADDRESS	CITY	STATE	Zip
VOLUNTEER	ENDORSE Monica Lindeen:	HOST A HOUSE PARTY:	

Host Name: _____ Date of Party: _____

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Montanans for Lindeen
P.O. Box 30672 • Billings, MT 59107

We need to elect Monica Lindeen! I'm willing to:

- | | | |
|--|--|--|
| <input type="checkbox"/> endorse | <input type="checkbox"/> distribute Lindeen's literature | <input type="checkbox"/> host a fundraiser |
| <input type="checkbox"/> help with a mailing | <input type="checkbox"/> have a yard sign | <input type="checkbox"/> put signs in my community |
| <input type="checkbox"/> go door-to-door | <input type="checkbox"/> make phone calls | <input type="checkbox"/> volunteer in my area |
| <input type="checkbox"/> other | | |

Name _____

Address _____

City _____ State _____ Zip _____

Home Phone _____ Work Phone _____ Cell Phone _____

E-Mail: (very important)

Occupation (required)

Employer (required)

Contribution: \$30 ____ \$50 ____ \$100 ____ \$250 ____ \$1000 ____ \$2100 ____

Federal law requires political committees to report the name, mailing address, occupation and name of employer for each contribution
Contributions are non-tax deductible and corporate contributions are not accepted

Please make checks payable to Montanans for Lindeen
PO Box 30672, Billings, MT 59107 www.Lindeen.net

In-Kind Contribution Form

COMMITTEE: Montanans for Lindeen

Donor:		
Address:		
City:	State:	Zip Code:
Work Phone:		Work Fax:

*IF DONOR IS AN INDIVIDUAL***Occupation:****Employer:**

(If self-employed, name of business)

IF DONOR IS A COMMITTEE**Name of Committee:****FPPC ID Number:****Description of goods or services donated:****Fair Market Value: \$****Date of Contribution:****PA DB:**

THE FAIR MARKET VALUE IS WHATEVER IT WOULD COST TO OBTAIN THE
DONATED GOODS OR SERVICES ON THE OPEN MARKET, AND NOT
NECESSARILY THE COST TO THE DONOR OF PROVIDING THE GOODS OR
SERVICES.

PLEASE ATTACH ANY RECEIPTS, INVOICES OR OTHER DOCUMENTATION

Follow Up

Congratulations on having a successful Montanans for Lindeen House Party!

Please return this sheet and the following items to our office within two days.

Name: _____

Phone: _____

Total Number of Guests: _____

Total Money Raised: _____

- ☐ ☐ Sign-in sheets
 - ☐ ☐ Completed contribution forms and checks
 - ☐ ☐ In-Kind Contribution form and receipts
 - ☐ ☐ Photos from your House Party*
- (e-mail digital pictures to jennifer@lindeen.net)

If you have any questions, please contact us at jennifer@lindeen.net

or

Thank you again for hosting a Montanans for Lindeen House Party!

Please return this sheet and the above items to:

Montanans For Lindeen
P.O. Box 30672
Billings, MT
59107

How to Contact Us

House Party Coordinators' Contact Information

Western Montana: Bryce Bennett Missoula, MT 59801 Phone: bryce@lindeen.net	Eastern Montana: Jesse Davis P.O. Box 30672 Billings, MT, 59107 Phone: Fax: jesse@lindeen.net
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You can also contact:

Jennifer Slep
Finance Director
445 Daniel Street
Billings, MT
59106

jennifer@lindeen.net